

REMARKS

Claims 1-15 are pending in the present application. Claims 1, 3, 9, 10 and 13 stand rejected. Claims 2, 4-8, 11, 12, 14 and 15 stand objected to. However, the Examiner has indicated claims 2, 4-8, 11, 12, 14 and 15 would be allowable if rewritten in independent form. Reconsideration of the present application in light of the present remarks is respectfully requested.

I. Telephone Interview April 8, 2005

Applicant thanks the Examiner for the courtesies extended during the telephone interview on April 8, 2005 and Applicant submits the present request for reconsideration in accordance with the Examiner's request during the interview.

II. Claim Rejections under 35 U.S.C. § 102

Claims 1, 9, 10 and 13 stand rejected under 35 U.S.C. § 102 in view of U.S. Patent No. 5,121,562 to Feller ("Feller").

Applicant's independent claim 1 requires the frame to be rotatably attached to the reversing table and separately rotatably attached to the leveling carriage. In contrast, in Feller, the element identified by the Examiner as the "frame" is rotatably attached to the element identified by the Examiner as the "reversing table," but is not *separately* rotatably attached to the element identified by the Examiner as the "leveling carriage."

Applicant's independent claim 9 requires the leveling carriage to be rotatably attached to the reversing table and separately rotatably attached to the frame assembly. In contrast, in Feller, the element identified by the examiner as the "leveling carriage" is rotatably attached to the element identified by the Examiner as the "reversing table," but is not *separately* rotatably attached to the element identified by the Examiner as the "frame."

Accordingly, Applicant respectfully submits that Feller does not anticipate Applicant's claims under 35 U.S.C. § 102 as asserted by the Examiner.

Moreover, the claim element "reversing table" is a term known in the art and used in the specification to refer to an element that rotatably or "reversibly" secures an attachment (*e.g.*, a snow plow blade) to a frame (*e.g.*, an A-frame), the frame being mounted to a vehicle. When the attachment is "reversed," for example between a left discharge position, a centered position and a right discharge position (as shown in Applicant's Figs. 4-6, respectively), the reversing table rotates with respect to the longitudinal axis of the vehicle. By contrast, the frame does not rotate with respect to the longitudinal axis of the vehicle. Accordingly, Applicant respectfully submits that the element identified by the Examiner as a "reversing table" is actually understood by one with ordinary skill in the art as a frame. Similarly, the element identified by the Examiner as a "leveling carriage" is understood by one with ordinary skill in the art as a reversing table.

Similarly, the Examiner contends Feller's plow blade (element 12) is a lift arm assembly. A "lift arm" or "lift arm assembly" is a term known in the art and used in the specification to refer to an element that positions or "lifts" the attachment (*e.g.*, snow plow blade) in a raised or lowered position. Applicant respectfully submits that Feller's plow blade would be understood by one with ordinary skill in the art to correspond to Applicant's moldboard (reference number 14 in Applicant's specification). Feller's plow blade and Applicant's moldboard are elements to be lifted by a lift arm assembly and do not form any part of a lift arm assembly itself. In fact, Feller's written description refers to a centered arm (not shown, described in Col. 2, line 6), which would be understood by one with ordinary skill in the art to correspond to Applicant's lift arm assembly.

Applicant respectfully submits that when the elements of Feller are identified as they would be understood by one with ordinary skill in the art, it is apparent Feller does not disclose any

element that corresponds to Applicant's claimed "leveling carriage" and cannot be used to reject Applicant's claims under 35 U.S.C. § 102.

Therefore, for the reasons provided above, Applicant submits that Applicant has overcome the Examiner's 35 U.S.C. § 102 rejections and respectfully requests the rejections be withdrawn.

III. Claim Rejections under 35 U.S.C. § 103

Claim 3 stands rejected under 35 U.S.C. § 103 over Feller in view of U.S. Patent No. 5,732,781 to Chambers ("Chambers"). In view of the remarks presented above with respect to the Examiner's 35 U.S.C. § 102 rejections, Applicant submits that Applicant has overcome the Examiner's 35 U.S.C. § 103 rejections and respectfully requests the rejections be withdrawn.

CONCLUSION

Applicants assert that this application is in condition for allowance. Early allowance is respectfully requested.

If for any reason the Examiner is unable to allow the application and feels that an interview would be helpful to resolve any remaining issues, the Examiner is respectfully requested to contact the undersigned attorney at (312) 372-2000.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

Patrick O. Richards
Patrick D. Richards
Registration No. 48,905

227 West Monroe Street
Chicago, IL 60606-5096
Phone: 312.372.2000 PDR:cnh
Facsimile: 312.984.7700
Date: April 11, 2005

**Please recognize our Customer No. 1923
as our correspondence address.**